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MEMO ENDORSED.

April 18, 2025

VIA CM/ECF
The Honorable Ona T. Wang, U.S.M.J.
United States District Court
Southern District of New York
500 Pearl Street, Courtroom 20D
New York, New York 10007

Re: *Palladino v. Guardian Veterinary Management LLC et al.,* No. 25 Civ. 355 (VSB) (OTW)

Dear Judge Wang:

We represent the Plaintiff and putative class and collective. We write to inform the Court that the Parties have conferred on Defendants' Motion to Stay Discovery earlier this week. The Parties believe they will be able to stipulate to an agreed stay of discovery with reciprocal tolling of relevant FLSA statute of limitations while the Motion to Dismiss is being decided. Plaintiff sent a proposed stipulation on April 16, 2025 that is being reviewed by Defendants. The Parties anticipate finalizing the stipulation for the Court's review and signature next week. Thus, Plaintiff respectfully requests up to April 25, 2025 to file the stipulation or file an opposition if necessary.[1] Defendants consent to this extension of time request.

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We thank the Court for its time and attention to this matter.

Application GRANTED.
If all parties agree to stay discovery, they are directed to file a joint letter motion requesting such a stay by Monday, April 28, 2025.

SO ORDERED.

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Ona T. Wang   Apr. 22, 2025
U.S.M.J.

Sincerely,

/s/ Armando A. Ortiz

Armando A. Ortiz

Counsel for Plaintiff and the Putative Collective/Class Members

CC: Defendants' Counsel (via ECF)

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[1] Plaintiff's opposition to this Letter Motion is originally due April 18, 2025, as outlined in the Court's Scheduling Order. While we hoped to finalize this stipulation by today, a few more days are ultimately necessary. Thus, we apologize for any inconvenience for this request being made the same date as the original deadline.